

To: Laidlaw, Tina[Laidlaw.Tina@epa.gov]
Cc: Suplee, Mike[msuplee@mt.gov]
From: Blend, Jeff
Sent: Tue 11/12/2013 10:16:26 PM
Subject: RE: A couple of Questions

Local taxes and fees includes the following:

- 1) General Government Activities: Charges for Services, Fines, Forfeitures, including public works, safety, interest on debt and health.
- 2) Business Type Activities: Hospital, water, sewer, solid waste, airport, business
- 3) Local property taxes

The source of these values for Montana towns is: Annual Financial reports of the cities and towns of Montana, FY 2011, Worksheet of interest within reports: 'Government-wide Statement of Activity', Local government Services Bureau, Montana Department of Administration, Kim Smith, (406) 841-2905, kims@mt.gov

Montana's cut-off value for tab F should be self-explanatory in that chart. The actual values were either calculated within 1% of the state median or using a histogram using standard deviation or visual cut-off points to create the cut-off values.

Jeff

From: Laidlaw, Tina [mailto:Laidlaw.Tina@epa.gov]
Sent: Tuesday, November 12, 2013 9:42 AM

To: Blend, Jeff
Cc: Suplee, Mike
Subject: A couple of Questions

Jeff,

HQs is reviewing MT's draft rules. Our economics had 2 questions (see below) re. the economic analysis and associated spreadsheets. Would you mind taking a look at these 2 questions and emailing me the answers?

Mike, I'm wondering if the responses to these questions is documented in summaries from the 2008 economic workgroup?

Feel free to call me if you want to discuss. Thanks!

Tina

HQs Questions:

To complete our evaluation of Montana's proposed economic analysis for individual dischargers, it would be helpful if we could get answers to the following two questions:

1. In the tab named: "E—Data for Secondary Test", row 21 requests "Local Property Tax Revenues + Local Fees." What local fees does this refer to?
2. In the tab named: "F—Calculating Secondary Score," the secondary score cut-off values for "weak", "mid-range", and "strong" are different than what we have in the 1995 EPA guidance. How were Montana's cut-off values established?